

ted
S.A.

C. DUKES SCOTT
EXECUTIVE DIRECTOR

P.O. Box 11263
Columbia, S.C. 29211



Phone: (803) 737-0800
Fax: (803) 737-0801

DAN F. ARNETT
CHIEF OF STAFF

June 14, 2006

VIA HAND DELIVERY

Charles L.A. Terreni, Esquire
Chief Clerk/Administrator
South Carolina Public Service Commission
101 Executive Center Dr., Suite 100
Columbia, SC 29210

RECEIVED
JUN 15 2006
PSC SC
DOCKETING DEPT.
JUN 14 PM 4:15
RECEIVED

Re: South Carolina Office of Regulatory Staff Comments to the Commission's Proposed Changes to Articles 3 and 4.

Dear Mr. Terreni:

On May 25, 2006, the South Carolina Office of Regulatory Staff ("ORS") submitted comments pertaining to Articles 3 and 4. Upon further review, ORS wishes to put forth the following revisions.

1. **103-318 Meter Test Records and Reports.** ORS inserted a subsection B which is comparable to the gas regulation, 103-418(B). For consistency with subsection A of 103-318, ORS would like to include in subsection B a record retention period of three years. With this revision, ORS proposes the following language for 103-318(B):
 - B. Whenever any service meter is tested, the original test record shall be preserved *for a minimum of three years*, including the information necessary for identifying the meter, the reason for making the test, the reading of the meter upon removal from service, and the result of the test, together with all data taken at the time of the test in sufficiently complete form to permit convenient checking of the methods employed and the calculations. (Emphasis added.)
2. **Reg. 103-327 Master Metering.** Upon further consideration and pursuant to this letter, ORS is withdrawing its proposed additions to paragraphs E and F of Regulation 103-327 Master Metering. As stated in ORS's original comments, the proposed language was an effort to provide for the allowance of submetering in

very limited circumstances. Subsequent to further analysis, ORS determined the reasoning for these proposed modifications was sound, but the actual modifications are not necessary.

3. **103-412. Data to be Filed with the Commission.** Because ORS submits Annual Reports on behalf of the operators, ORS would like to specify that a hard copy of the Annual Report is to be submitted to ORS.

Annual Reports. Each gas utility operating in this State shall provide a hard copy and an electronic copy of Federal Energy Regulatory Commission ("FERC") Form 2 or its equivalent to ORS and *a hard copy of the Annual Reports* required by the Federal DOT and PHMSA. (Emphasis added.)

In 103-412.2.6, ORS would like to include a technical amendment so that the section reads:

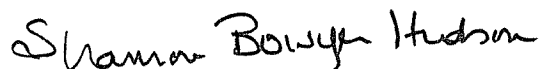
2.6. Pipeline Safety. All gas systems subject to pipeline safety regulation shall provide to ORS those reports, policies and procedures required by the Federal Pipeline Safety *Regulations: Minimum Safety Standards for the Transportation of Natural and Other Gas, 49 C.F.R. as they are amended from time to time* to include, but not limited to, the following: (Emphasis added.)

4. **103-492. Safety Program.** ORS would like to include a technical amendment so that the section reads:

Each gas system shall adopt and execute a safety program, fitted to the size and type of its operations. As a minimum, the safety program should comply with the Federal Regulations: Minimum Safety Standards for the Transportation of Natural and Other Gas, 49 C.F.R. *as they are amended from time to time*. (Emphasis added.)

We appreciate you allowing us to put forth the above revisions.

Sincerely,



Shannon Bowyer Hudson
C. Lessie Hammonds